

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

UNITED STATES OF AMERICA
Plaintiff

v.

STEFAN HRVATIN,
Defendant

No. 4:22-CR-00612-S

MOTION TO WITHDRAW AS ATTORNEY OF RECORD

COMES NOW, Defendant Stefan Hrvatin, through counsel, and petitions this Court to allow attorney Carlos M. Fleites to withdraw as attorney of record in this matter. In support thereof, he states the following:

1. On or about October 5th, 2023, Defendant retained undersigned to represent him in the above referenced case. The representation agreement and undersigned's Notice of Appearance contemplated trial level representation only.
2. On March 20th, 2024, The Court granted Defendants' Second Joint Motion to Dismiss the Superseding Indictment. This effectively terminated this case at the trial level.
3. On April 4th, 2024, the Government filed their Notice of Appeal.
4. Undersigned counsel filed motions for return of Defendant's passport, bond collateral, and remained on as attorney of record to attend to various housekeeping matters and as a courtesy to Mr. Hrvatin. As of July 16th, 2024, all motions have now been granted by The Court.
5. Counsel has now fulfilled all of his contractual obligations to Defendant. Undersigned counsel does not engage in appellate practice, nor did the agreement between the parties contemplate representation in appellate matters.
6. At this time, Defendant and counsel have agreed to file a motion to terminate undersigned counsel as his attorney of record in this matter.

WHEREFORE, based upon the foregoing, the undersigned respectfully requests an order removing him as attorney of record for Defendant Stefan Hrvatin.

I agree with the relief sought in the above Motion and consent to the withdrawal of Attorney Carlos Fleites as my attorney in this case.


Stefan Hrvatin
Defendant

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the above was electronically filed and foregoing was furnished to the State Attorney's Office on this 22nd day of July 2024.

By: /s/Carlos M. Fleites
Carlos M. Fleites, Esq
Attorney for Defendant
FBN: 370850
407 Lincoln Road, 12E
Miami Beach, FL 33139
Telephone (305) 672-8434
CMFleites@mylawyr.com